

FILED

MAY 16 2017

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MARTIN RISCHALL,

Defendant.

4:17CR210 RLW

**INFORMATION**

The United States Attorney charges that:

**COUNT 1**

**[False Statements Relating to Health Care Matters]**

On or about June 26, 2013, in Hannibal, Missouri, in the Eastern Division of the Eastern District of Missouri, the defendant,

**MARTIN RISCHALL,**

knowingly and willfully made and used materially false writings and documents, knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of and payment for health care benefits, items, and services involving the Medicare program, a health care benefit program as defined in 18 U.S.C. § 24(b), in violation of 18 U.S.C. § 1035, in that the defendant created a progress note concerning patient C.B., a resident at Levering Regional Health Care Center, that falsely stated that “the patient or staff request treatment because the toenails are painful to such a degree, as to affect ambulation and balance” when the defendant then and there well knew said statements and representations were false, fictitious, and fraudulent.

All in violation of 18 U.S.C. § 1035(a)(2).

**FORFEITURE ALLEGATION**

The Grand Jury further finds probable cause that:

1. Pursuant to Title 18, United States Code, Section 982(a)(7), upon conviction of an offense in violation of Title 18, United States Code, Section 1035 as set forth in Count 1, the defendants shall forfeit to the United States any property, real or personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense or conspiracy.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offense.

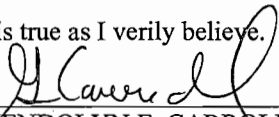
Date: \_\_\_\_\_

CARRIE COSTANTIN  
Acting United States Attorney

  
\_\_\_\_\_  
Gwendolyn E. Carroll  
Assistant United States Attorney

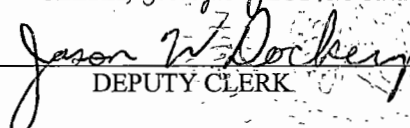
UNITED STATES OF AMERICA     )  
EASTERN DIVISION            )  
EASTERN DISTRICT OF MISSOURI    )

I, Gwendolyn E. Carroll, Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

  
\_\_\_\_\_  
GWENDOLYN E. CARROLL

Subscribed and sworn to before me this 9<sup>th</sup> day of May 2017.

  
\_\_\_\_\_  
CLERK, U.S. DISTRICT COURT

By:   
\_\_\_\_\_  
DEPUTY CLERK